

FILED

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

UNITED STATES DISTRICT COURT

JUN 27 2025

for the

District of New Mexico

MITCHELL R. ELFERS
CLERK

____ Division

Case No. **25 cv 606 DHU/GJF**

(to be filled in by the Clerk's Office)

Justin Christie

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

1) Chaves County 2) City of Roswell
3) Chaves County Sheriff's 4) Warden Briscoe
5) Chief Crocker 6) Corporal Muhammad 7) Lt Segovia
8) Sgt King 9) Sgt Wallen 10) Sgt Davidson
11) C/O Espinosa 12) C/O Alsummer

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Justin Christie
 All other names by which
 you have been known: (Sama'el)
 ID Number 92722
 Current Institution Penitentiary of New Mexico
 Address P.O. Box 1059
Santa Fe NM 87504-1059
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name Chaves County
 Job or Title (*if known*) Prime Employer of All Defendants Below
 Shield Number _____
 Employer State of New Mexico
 Address 3701 S. Atkinson
Roswell NM 88203
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name Chaves County Sheriffs
 Job or Title (*if known*) _____
 Shield Number _____
 Employer County of Chaves
 Address Roswell NM _____
City State Zip Code
☒ Individual capacity ☒ Official capacity

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

Defendant No. 3

Name

City of Roswell

Job or Title (if known)

Shield Number

Employer

Chaves County

Address

Roswell

NM

City

State

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Warden Briscoe

Job or Title (if known)

Deputy Warden

Shield Number

Employer

Chaves County

Address

3701 S. Atkinson

Roswell

NM

City

State

88203

Zip Code



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

① First Amendment, violation of Freedom of Speech, Freedom of Privacy,

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

See Attachments for
Column (B)

Defendant No 9

Name
 Job or Title (if known)
 Shield Number
 Employer
 Address

Sgt Wallen
 Sergeant

Chaves County
 3701 S. Atkinson
 Roswell NM 88203

☒ Individual capacity ☒ Official capacity

Defendant No. 10

Name
 Job or Title (if known)
 Shield Number
 Employer
 Address

Sgt Davidson
 Sergeant

Chaves County
 3701 S. Atkinson
 Roswell NM 88203

☒ Individual capacity ☒ Official capacity

Defendant No 11

Name
 Job or Title (if known)
 Shield Number
 Employer
 Address

c/o Espinosa
 County Officer

Chaves County
 3701 S. Atkinson
 Roswell NM 88203

☒ Individual capacity ☒ Official capacity

Defendant No 12

Name
 Job or Title (if known)
 Shield Number
 Employer
 Address

c/o Alsummer
 County Officer

Chaves County
 3701 S. Atkinson
 Roswell NM 88203

☒ Individual capacity ☒ Official capacity

* continue

Defendant No. 5
Name
Job or Title (if known)
Shield Number
Employer
Address

Chief Crocker
Chief
Chaves County
3701 S. Atkinson
Roswell NM 88203

Defendant No. 6
Name
Job or Title (if known)
Shield Number
Employer
Address

☒ Individual capacity ☒ Official Capacity
Corporal Muhammad
Corporal
Chaves County
3701 S. Atkinson
Roswell NM 88203

Defendant No. 7
Name
Job or Title (if known)
Shield Number
Employer
Address

☒ Individual capacity ☒ Official capacity
Lt Segovia
Lieutenant
Chaves County
3701 S. Atkinson
Roswell NM 88203

Defendant No. 8
Name
Job or Title (if known)
Shield Number
Employer
Address

☒ Individual capacity ☒ Official capacity
Sgt King
Sergeant
Chaves County
3701 S. Atkinson
Roswell NM 88203

☒ Individual capacity ☒ Official capacity

"Freedom of Fairness and Freedom to practice Religion."

- (2) Violation of Fourth Amendment "Unlawful warrant to sufficiently specify the person or place or things to be seized" (Islamic Materials).
- (3) Violation of Fifth Amendment "Equal Protection Clause and Rights."
- (4) Violation of Fifth Amendment "Racial Discrimination, Religious Minority Discrimination, Ethnicity Discrimination."
- (5) Violation of Eighth Amendment "Cruel and Unusual Punishment," "Deliberate Indifference," "Right to be free from all Sexual Assault, Abuse, Harassment, Innuendos."
- (6) Violation of Fourteenth Amendment "Denial of Liberty Interest without Due Process," "Denial of Equal Protection of Law," "Denial of Freedom of Association," "Denial of Assembly for Religious worship, prayer, tradition, religious fasting, religious studies," "Denial of Jumuah," "Denial of Taleem," "Denial of Religious Material (Prayer Rugs, Crowns, Kufis, Turbans, Mushafs (All Arabic Qurans), English Qurans, Islamic Literature), Denial of Religious Dietary meals (Halal meals) and Religious Articles, Denial of P.R.E.A. Rights (Hotline number and address to P.R.E.A. coordinators, Lack of P.R.E.A. Education) "Posting of P.R.E.A. Advertisement and Staff Training in facility," Violation of Americans with Disabilities Act (A.D.A) (Mental Health Disorders).
- (7) Violation of Chaves County, Chaves County Detention Center, Chaves County Sheriff's Rules and Policies and Federal, Local and State Laws.
- (8) Violation of P.L.R.A. (Prison Litigation Reform Act).
- (9) Violation of Inmates Rights to Grievance procedure.
- (10) Violation of B.L.U.E.P.A.
- (11) Violation of Due Process (Constitutional rights to Due Process).

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Warden Briscoe is the Warden of the Chaves County
see Attachments →

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☒ Pretrial detainee
☐ Civilly committed detainee
☐ Immigration detainee
☒ Convicted and sentenced state prisoner
☐ Convicted and sentenced federal prisoner
☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

Chaves County Detention Center, Dates

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose. see Attachments →

N/A

Detention Center in the City of Roswell, State of New Mexico and County of Chaves located at 3701 S. Atkinson Roswell New Mexico 88203. He is also employed by the County of Chaves under the operation of the Chaves County Sheriff's. He's legally responsible for the operations of the Chaves County Detention Center and for the welfare of all the inmates of that facility.

Warden Briscoe is the Warden of the Chaves County Detention Center, who, at all times mentioned in this complaint, held the rank of all Jail guards and was assigned by the County of Chaves and the Chaves County Sheriff's Department and the Chaves County Detention Center to oversee Jail policies, operations and rules.

Warden Briscoe is the Sole and Main Supervisor of all operations and Jail guards and policies here at the Chaves County Detention Center.

Chaves County, City of Roswell, Chaves County Sheriff's is the employer, Supervisor of Warden Briscoe, Chief of Security Crocker, Lt Segovia, Corp Muhammad, Sgt Wallen, Sgt King, Sgt Davidson, c/o Espinosa and c/o Absummer, and are being sued individually and in His/Her official capacity.

At all times mentioned in this complaint, each defendant acted under color of State Laws and Local Laws.

"This is a Civil Action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of State Laws, of rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1343 (a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff claims for injunctive relief are authorized by 28 U.S.C. Section 2283 and 2284 and Rule 65 of the federal rules and Civil Procedure."

At all times mentioned in this complaint all facts are true and correct.

At all times mentioned in this complaint, the County of Chaves and the City of Roswell and the Chaves County Sheriff's at all times held and currently hold the

continued on back →

rank of all employees and are legally responsible for the operations and policies at the Chaves County Detention Center and for the welfare of all inmates at that facility.

Dates:

11-12-2024, 11-19-2024, 11-22-2024, 12-23-2024, 1-03-2025, 2-15-2025, 2-20-2025, 2-22-2025 and 3-11-2025

All events happened on dates listed above and all events giving rise to claim happened at the Chaves County Detention Center located at 3701 S. Atkinson Roswell New Mexico 88203 City of Roswell New Mexico in the County of Chaves.

All events happened in Housing Units, at the Chaves County Detention Center located at 3701 S Atkinson Roswell New Mexico 88203

C. What date and approximate time did the events giving rise to your claim(s) occur?

Dates: 11/12/2024, 11/19/2024, 11/22/2024, 12/23/2024,
1/3/2025, 2/14/2025, 2/20/2025, 2/22/2025 and 3/11/2025
All events happened at various times.

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

At all times relevant to this case, Plaintiff Justin Christie
see Attachment

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Mental health issues & mental and emotional instability, bi-polar disorder, anxiety, Post traumatic stress disorder (PTSD), Insomnia, borderline personality disorder (BPD), disassociative disorder, Attention Deficit Disorder (ADD), paranoia, schizophrenia, mental and emotional damages

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff respectfully prays that this court enter judgement granting plaintiff:

- Declaration that acts and omissions described herein violated plaintiff's rights under constitutions and laws of the United States.
- Preliminary and permanent injunction ordering defendants: Chaves County, City of Roswell, Chaves County Sheriffs, Warden Briscoe, Chief Crocker, Corporal Muhammad It Segovia, Sgt King, Sgt Wallen, Sgt Davidson, S/o Espinosa and c/o Alsummer follow policy and allow All Muslims to have all materials and their respective dietary needs (Halal meals), such as 1) Mushafs (All Arabic Qur'ans for those who know how to read Arabic) 2) Physical Qur'ans 3) Prayer Rugs 4) Turbans, Crowns or Kufis 5) Dhikr beads 6) Prayer oils 7) Miswaks (wooden toothbrush sticks) 8) Halal-friendly hygiene

Relief continued on back

- 9) Islamic pendants 10) Islamic books 11) Takeem classes 12) Jumuah (Friday Prayer services 13) Fast the month of Ramadhan 14) To ensure the policies on P.R.E.A at the facility are in compliance to P.R.E.A Laws and Policies. 15) To train all staff to announce gender in opposite sex pods, dorms and living quarters and areas. 16) To respect opposite sex privacy. 17) To answer inmates "G.P's" and grievances in a timely manner.
- C) Compensatory damages in the amount of \$50,000 against each defendant jointly and severally.
- D) Punitive damages in the amount of \$1,000,000 against each defendant:
 - 1) Warden Briscoe 2) Chief Crocker 3) Corporal Muhammad 4) Lt Segovia 5) Sgt King 6) Sgt Wallen 7) Sgt Davidson 8) c/o Espinosa 9) c/o Alsummer
- Punitive damages in the amount of \$150,000,000 against defendants:
 - 1) Chaves County 2) City of Roswell 3) Chaves County Sheriffs
- E) Jury trial on all issues triable by jury
- F) Plaintiffs cost in this suit
- G) Any additional relief this court deems just and proper and equitable.

use to be housed in North Echo cell 10 in the County jail in the city of Roswell New Mexico address 3701 S Atkinson Roswell New Mexico 88203 detained by the Chaves County Sheriffs and the Roswell police department "(To name agencies)". Plaintiff now currently resides at Penitentiary of New Mexico P.O. Box 1059 Santa Fe New Mexico 87504-1059 until projected release in February 21, 2028.

On November 12, 2024, I Justin Christie had asked Sgt Wallen if I could obtain a Mushaf (all Arabic Qur'an), a prayer rug, a crown and turban and be placed on the Halal meals (Islamic diet). I was told that the facility didn't have and hasn't had those types of materials for over 2 years, and that all the Qur'ans, prayer rugs, Halal meals, kufis were destroyed or donated at that time. On November 19, 2024, I Justin Christie had put in a "G.P." (General Population) request slip. This is an electronic request slip that all inmates have access to by a Securus Technology Tablet that is assigned to all inmates and all inmates have access by a Securus Kiosk located in all of the pods. All grievances and "G.P." request slips, or anything related to inmates needs are accessible by these electronic devices to be answered by the facility or officials in charge of that department. My "G.P." request slip was answered by Lt Segovia and she told me I wasn't getting anything because certain individuals were abusing the Islamic materials 2 years ago and that the Chief of Security Crocker said "no, that I cannot have my requested materials."

On November 22, 2024, I Justin Christie had submitted a grievance via my assigned tablet through Secure View (an accessible app on my tablet) and Kiosk. This grievance was filed for violating my First Amendment right, "Freedom to practice religion", and deprivation of my religion and religious material.

On December 24, 2024, I had spoken with Lt Segovia about my grievances being unanswered in a timely ~~many~~ manner. She had told me that she was told by Chief Crocker which grievances to answer and that she doesn't have any control over the whole situation and that Chief Crocker said "NO". At that point I had offered the addresses to the Islamic Center in Albuquerque New Mexico, Nation of Islam in Chicago Illinois and the

Al Aqsa Islamic Society/Masjid Al-Aqsa in Philadelphia Pennsylvania to inquire and request for Qur'ans, Prayer Rugs, Crowns and other Islamic material in order to take some of the burden of expenses off the facility because I know that the resources would be free of charge through these avenues. All resources were denied for use to obtain materials necessary to practice my faith (Islam), by Warden Briscoe and Chief Crocker even though materials would be free.

On January 3, 2025, I Justin Christie had spoken with Corporal Muhammad, who denied me to have these materials requested. Later that day, I had submitted a grievance via my tablet to obtain materials considering the month of Ramadhan was approaching.

On ~~January~~ February 15, 2025, I Justin Christie, had spoken with the Chief of Security Crocker during a shake down of cells in search for "Hooch" on all cells, in regards to Islamic materials and Halal meals. He informed me that I was not getting any Islamic materials. I explained to him that Muslims need to offer Salat (Prayer) 5 times per day and that they are Fard (Obligatory) prayers according to Islamic Laws and faith given by the Prophet Muhammad (Peace and Blessings be upon him) and to be in accordance to the Laws of Allah. I had explained that the food was not Halal friendly and being Muslim, I am forbidden to eat or use any products that contains Pork or Pork by-products. I further explained that my Muslim diet requires me to only eat food that is Halal. And to only use products that are free from "Swine" (Pork) and pork by products. Pork has been used in the beans, this contaminates the whole food tray once food with pork and by products touches tray. I'm forced to use toothpaste, shampoo, bodywash, deodorant that have yellow #5, Red #40 and pork by products ingredients such as "Sorbitol". Chief Crocker told me that his policy stands and that if ~~he~~ I don't like how he runs his facility, then stay out of jail. I further explained that being Muslim, I don't have a physical Qur'an and my only access to a Qur'an was through the Edovo app, an app that he was unaware that was on the tablets, and that it's not a physical Qur'an, because it states in the (Qur'an in Surah (Chapter) 56 Al-Waqiah Ayahs ~~78~~ (Versus) 78-80 "Inal Qur'anal Karim. Fee Kitabim

- maknun. La yamassu illal mutaharun. Translation: "Indeed a Noble Book. In a well preserved Book, which none shall touch except those who are purified." This means that those who are unclean are NOT permitted to touch it. Even as being a Muslim, I have to be in a state of (wudu) or (Ghusl) "Purity" before I am allowed to touch my Qur'an. My Qur'an (physical Qur'an) is not to be touched or confiscated, especially by Kafirs (Disbelievers). So, the Qur'an on the tablet cannot be considered a physical Qur'an. I told him I should be able to keep my Qur'an on me at all times in case of a need to read before prayer. I have been diagnosed with severe anxiety and P.T.S.D. I have also been diagnosed with many other mental health issues. My Qur'an was being confiscated every night at 11 pm because it's on my tablet. At the time Isha prayer was around 12:00 am and I had to read before prayer. I had explained that I needed proper materials so that I can properly practice my religion. I had further expressed that it was unfair for the Christians to have a physical Bible while the Muslims were not allowed a physical Qur'an. I also explained that the Christians and Jehovah Witnesses have worship services and the Muslims didn't have Jum'ah or Takim services. The Islamic faith didn't have anything. I had observed that our attempt to resolve was going nowhere, so I ended our conversation.

On February 20, 2025, I Justin Christie, had submitted a "G.P" electronic request slip to be allowed to participate in fasting for the Holy month of Ramadhan, to no avail because my "G.P." went unanswered. This "G.P." had requested for Halal meals, religious materials such as: Qur'ans, Prayer Rugs, Crowns, Kufis or Turbans, Prayer Oils, Islamic literature and to be able to fast the month of Ramadhan, a microwave to heat my food or hot pot. I was denied.

On March 11, 2025, 2 weeks into Ramadhan, I Justin Christie, had submitted a grievance for not allowing all Muslims to have physical Qur'ans, Crowns, Kufis or Turbans, Islamic material, Islamic literature, Islamic Halal meals, and not allowing the Muslim community to practice our faith in accordance to the Qur'an and Hadiths. Muslims have 5 obligatory Salat (Prayers): Fajr, Dhuhr, Asr, Maghrib and Isha. These prayers are mandatory in the Islamic faith and in accordance to the 5 pillars of Islam and requires a prayer rug for protection from impurities and provides comfort while prostrating. The

Qur'an cannot be handled with impure hands and without making wudu or ghusl (Process to clean oneself of all impurities using water). This is also required before all prayers, after using the restroom and sexual intercourse. This is why the Securus tablets cannot be considered a Qur'an because it can be confiscated and handled by c/o's who are unclean and are Kufir (Non-Muslim). Also, the Muslims were not allowed to fast the month of Ramadhan, while the Mushriks (Christians) were allowed to celebrate Christmas, New Years, Easter, Halloween and Thanksgiving. So, while the Christians and Jehovah's Witnesses are allowed to worship, Muslims are not acknowledged in this respect.

On February 22, 2025, I Justin Christie, had made a complaint to Sgt Davidson for P.R.E.A. violations. I further filed a grievance in regards to that facility and the correctional officers not abiding by P.R.E.A. policies and rules. My grievance was filed because that facility didn't have a P.R.E.A. hotline number or addresses to P.R.E.A. coordinator office to confidentially report. P.R.E.A. policies require for the facility to put posters throughout the facility and post P.R.E.A. hotline numbers above dayroom phones to report P.R.E.A. violations and conditions. Also female staff are supposed to announce "Female on the floor" upon entering a male inmates pod. Male staff are supposed to announce "Male on the floor" upon entering female inmates pod to protect inmates privacy.

On February 22, 2025, correctional officer Espinosa entered the North Echo pod without announcing "Female on the floor" and she had walked by my cell and looking through the window and paused while I was using the restroom. I told her that in accordance to the P.R.E.A. policy, she was violating my Fourth Amendment rights, "Rights to Privacy". She then had flicked me off and smiled while seductively saying fuck you, being sarcastic and telling me she was going to give me a 72 hour lockdown if I didn't "Shut the fuck up". Also, that facility was supposed to play a video on P.R.E.A. in orientation upon arrival to educate those who are coming to jail. All female staff had entered the pod without announcing their presence to protect our rights to be free from any P.R.E.A. situations that may occur. Any report of P.R.E.A. is supposed to be reported and answered promptly. My grievances

were never answered.

My right to a grievance procedure to redress my issues on prison policies were not being answered at all. So I am coming to the courts for further redress.

On December 7, 2024, Sgt King stopped by my cell at the time, on North Echo 10 and told me that "I was not getting any Islamic material and that Warden Briscoe don't lose lawsuits and that they have better things to do like run a facility and don't have time to accommodate any "sand niggers". Racial discrimination, religious discrimination, ethnic discrimination or minority discrimination should not be tolerated and is unconstitutional.

In the month of January sometime, c/o Alsummer filed a "catch 22" ~~etc~~ complaint against that facility in the favor of the Islamic community. Plaintiff in this complaint is Muslim and have experienced discrimination against my religion and religious beliefs.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Chaves County Detention Center

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)? Violation of Local, State and Federal Laws, Violation of U.S.

Constitution: 1) First Amendment 2) Fourth Amendment 3) Fifth Amendment 4) Eighth Amendment
5) Fourteenth Amendment 6) Violation of PLRA 7) Violation of RLUIPA 8) Violation of P.R.E.A.
9) Violation of ADA 10) Violation of Chaves County, Chaves County ~~Detention~~ Detention Center,
City of Roswell and Chaves County Sheriff's policies.

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

- E. If you did file a grievance:

1. Where did you file the grievance?

On inmates assigned tablets at Chaves County Detention Center via Secureview.

2. What did you claim in your grievance?

Violation of P.R.E.A. Policies
Violation of Constitutional rights
Deprivation of freedom of religion

3. What was the result, if any?

All grievances remain unanswered when I was there

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

According to the PLRA, when a grievance is unanswered, my administrative remedies have been exhausted. Can't appeal if the grievance goes unanswered.

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

~~PRO~~

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Please subpoena documentation from secure view

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this “three strikes rule”?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition.

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

☐ Yes☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

June 18, 2025

Signature of Plaintiff

Justin Christie

Printed Name of Plaintiff

Justin Christie

Prison Identification #

92722

Prison Address

Penitentiary of New Mexico P.O. Box 1059
 Santa Fe NM 87504-1059

City

State

Zip Code

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

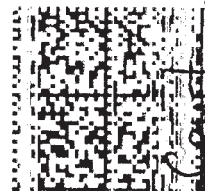
Penitentiary of New Mexico

P.O. Box 1059

Santa Fe, New Mexico 87502-1059

Name Justin Chrishe

No: 92722 Unit: 2-243



FIRST CLASS MAIL

IM

Legal Mail

United States District Court

RECEIVED District of New Mexico

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

Office of the Clerk, Suite 270

333 Lomas Blvd NW

Albuquerque, New Mexico 87102

CLERK

MITCHELL R. ELFERS

Legal mail

87102332272 0023

